

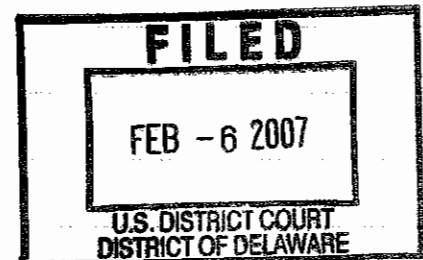
In The United States District Court
For The District of Delaware

James W. Riley,
Plaintiff,

U.

Stanley Taylor, et al.,
Defendants

C. A. No. 06-01-GMS



Plaintiff's Second Amended
Petition

BD scanned

Plaintiff James Riley herein below Amend the Relief Section V, paragraph (u) to his original lawsuit complaint (I.D#2) pursuant to Rule 15 of the F.R.C.P

Plaintiff Amend par. (u) on back of page 5 to his original complaint to simply add additional requests for monetary relief for all defendants' willful and persistent disregard for plaintiff's serious medical needs and life; and defendants' continued deliberate indifference by failing to treat plaintiff's serious medical needs resulting in prolong pain & suffering; physical irreparable harm & injuries; mental & emotional suffering due to defendants' intentional denying medical treatment; and defendants' intentional attempt to cause blindness and wrongful death by denial of adequate medical care for plaintiff's deteriorating eye sight, rectal dysfunction and exposure to Necrotizing Fasciitis bacteria infection (or streptococcus infection).

Wherefore For the reasons set forth above, in additional, paragraph (u) shall further state:

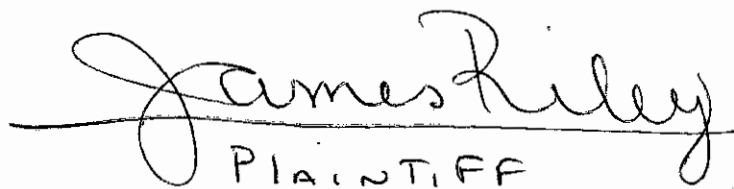
(u) 1. Award plaintiff monetary relief for punitive and compensatory damages from each defendant in the amount of \$1,850,000 for the unconstitutional acts committed by the defendants against plaintiff described in the complaint and all pleadings filed subsequently after the complaint; 2. Award plaintiff \$250,000 for past and present pain & suffering; 3. Award plaintiff \$1,250,000 for past and present physical irreparable harm & injuries; 4. Award plaintiff \$1,250,000 for past and present mental and emotional suffering; 5. Award plaintiff \$1,000,000 for permanent injury or injuries and future suffering and emotional damage; and 6. Award plaintiff \$12,000,000 (12 million) for intentional attempted wrongful death and blindness.

The above amended requested relief is for the denial of medical treatment identified in paragraphs (p) thru (t) to plaintiff's original complaint at page 5. *

* This is plaintiff's second amended petition. The first amended petition is dated December 27, 2006 and filed on the court docket 01/04/2007 (I. D. #52). Both amendments apply to CMS/FCM defendants' policy and practice to deny adequate medical care as the approximate cause of plaintiff's injuries identified in the Relief Section of his complaint.

These additional requests for monetary relief are not unreasonable for the callous and deliberate acts of blatant disregard for plaintiff's serious medical needs by all defendants named herein. Thus, the requested reliefs are consistent with similar grant of monetary relief in Combs v. Holman, 134 F. Appx. 669 (5th Cir. 2005) (unpublished); Siggers-El v. Barlow, 433 F. Supp. 2d 811 (E.D. Mich. 2006) and Mitchell v. The State of New York, Albany Court of Claims, Case No. 103000 (prisoner denied medical treatment for glaucoma which caused blindness in right & left eyes and substantial damage award granted).

Plaintiff swear under the penalty of perjury for any false statements that the foregoing facts are true and correct.


PLAINTIFF

(Date: JAN. 29, 2007)

Certificate of Service

I, James Riley, hereby certify that I have served a true
and correct cop(ies) of the attached: Plaintiff's Second Amended
Petition upon the following
parties/person (s):

TO: Kevin J. Connors, Esq.
1220 N. Market, ST., 5th fl.
P. O. Box 8888
Wilmington, Delaware
19899-8888

TO: _____

TO: Ophelia M. Waters, Esq.
Deputy Attorney General
Department of Justice
820 N. French Street
Wilmington, Delaware
19801

TO: _____

BY PLACING SAME IN A SEALED ENVELOPE and depositing same in the United States Mail at the Delaware Correctional Center, Smyrna, DE 19977.

On this 3 day of January Feb., 2007
James Riley

1/M James Riley
SBI# 16976 UNIT MACH Bldg 22
DELAWARE CORRECTIONAL CENTER
1181 PADDOCK ROAD
SMYRNA, DELAWARE 19977



U.S.M.
X-RAY

Office of The Clerk
U. S. District Court
844 King St., Lockbox 18
Wilmington, Delaware
19801

